

REMARKS

Reconsideration of the present application is respectfully requested.

In the Office Action, the Examiner indicated that claims 6, 8 and 10-11 would be allowable if rewritten in independent form. In addition, claims 1-5, 7 and 9 were rejected under 35 U.S.C. §102(b) as being anticipated by "Real-Time Procedural Textures" (Rhoades). On page 3 of the Office Action, it is also stated that this rejection is also in view of U.S. Patent No. 6,111,582 (Jenkins). However, it is believed that the reference to Jenkins was inadvertent, since the remainder of the Office Action makes no reference to Jenkins. Further, the rejection is under §102(b), which is typically based on a single reference. Accordingly, Jenkins will not be addressed herein any further.

Applicants gratefully acknowledge the indication that claims 6, 8 and 10-11 contain allowable subject matter. However, Applicants have not rewritten these claims in independent form, since it is believed that independent claim 1 should be allowable as discussed below.

Rhoades is directed to a texture editor that allows a user to interactively create and edit procedural textures. As noted by the

Examiner, Rhoades recites on page 96, 2nd column, lines 12-14, that procedural textures are implemented via a simple virtual machine having an assembly language-like instruction set called T-codes, a set of registers in pixel memory, and a set of parameters in the Graphics Processor memory. The Graphics Processor is shown in FIG 1 and provides IGC commands to a Rrenderer for execution. The IGC commands are produced from interpretation of a T-code program.

(See 2nd column, lines 20-23) Thus, the IGC commands are generated within the Rhoades texture editor itself, as the Graphics Processor (which generates the IGC commands) is part of the Rhoades texture editor itself.

In stark contrast, the present invention as recited in independent claim 1 requires:


the apparatus having an input to receive via a network identifying data identifying one of the set of standardized textures, and means for processing the data to generate output texels of the identified texture, wherein each texture of the standardized set is a procedural texture, the identifying data comprises one or a sequence of program commands, the execution of which will result in the generation of a respective procedural texture, with the means for processing data comprising a processor operable to implement all such input program commands or sequences of input program commands as required to generate the procedural textures of the standardized set.
(Emphasis added)

Receiving program commands via a network is nowhere taught or suggested in Rhoades. Rather, the Rhoades texture editor itself generates IGC commands. Accordingly, Applicants respectfully submit that independent claim 1 is in allowable form and request allowance thereof. In addition, as claims 2-11 depend from the independent claim 1, Applicants respectfully request that claims 2-11 also be allowed.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, Applicant reserves the right to respond to those rejections and arguments and to advance additional arguments at a later date. No arguments are waived and none of the Examiner's statements are conceded. And in particular no official notices are conceded.

It is respectfully submitted that the present application is in proper form for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

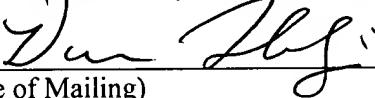
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September 26, 2005

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